

**REMARKS**

Claims 1-29 are pending.

Claims 1-2, 7-8, 13, 18-19, 24-25 and 29 were rejected under 35 USC 103(a) as being unpatentable over Graham, U.S. Patent 5,821,915, in view of Pellar, U.S. Patent 4,196,451. This rejection is respectfully traversed.

The Examiner asserts that Graham teaches all of the features of claim 1 except generating an output document using a new dither pattern having a different screen angle from among a plurality of alternatives, but cites Pellar as teaching this feature and asserts that "[T]he use of such a selection in order to produce the pattern rotation described by Pellar in the final image produced by Graham et al. would be an expedient obvious to one of ordinary skill in the art."

Applicants respectfully submit that the Examiner has failed to provide any evidence of a motivation to one of ordinary skill in the art to modify Graham in light of the teachings of Pellar. The Examiner has merely made a conclusory statement that it would have been obvious, but offers no such evidence within the prior art itself.

Graham teaches that it is desirable to reduce the appearance of moiré patterns, but provides for a specific method of doing so. Specifically, Graham teaches a method for removing artifacts from a bitmap of image data produced by scanning a halftone dot image by (a) calculating a weighted average intensity value for a target pixel based on a weight factor for the target pixel and on weight factors for neighboring pixels in the bitmap of image data; (b) repeating step (a) for each pixel in the bitmap of image data; and (c) replacing the intensity value of each pixel in the bitmap of image data with the weighted average intensity value for each such pixel (abstract). This is one method of removing the effects of moiré, and does not relate in any way to dither patterns, which are usually used to falsely reproduce a continuous halftone image. There is simply no suggestion of the desirability to modify the method of Graham in light of the teachings of Pellar to achieve the claimed invention. To do so would be to completely abandon the method devised in Graham for a method more closely related to the claimed method. The Examiner is merely attempting to

reconstruct the claimed invention in hindsight, and has provided no motivation to modify Graham in view of Pellar. Accordingly, Applicants request that this rejection be withdrawn.

Even if would have been obvious to modify Graham in view of Pellar, this would not result in the claimed invention inasmuch as Pellar does not teach or suggest that the screen angle of the original image is referenced to control the screen angle of dot pattern.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 325772012000.

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Respectfully submitted,

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